

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JUAN CABRERA,

Plaintiff,

v.

BOSTON SCIENTIFIC CORPORATION,

Defendant.

USDS SDNY
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DATE FILED: 12/12/07

Case No. 07-CIV-9935

STIPULATION AND PROPOSED ORDER

Plaintiff Juan Cabrera and Defendant Boston Scientific Corporation, by and
through their undersigned counsel, hereby stipulate to the following:

1. Plaintiff filed this action on November 9, 2007.
2. Defendant's last day to answer, move or otherwise respond to the complaint shall be extended to January 11, 2008.
3. The parties have not sought any previous extension of Defendant's answering deadline.
4. Defendant waives the affirmative defense of lack of personal jurisdiction.

Dated: New York, New York
December 7, 2007

Respectfully submitted,

KAYE SCHOLER LLP

By:



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SO ORDERED:  12 Dec

2007

Hon. Leonard B. Sand
United States District Judge